

MARGARET A. MCLEATCHIE, Nevada Bar No. 10931
LEO S. WOLPERT, Nevada Bar No. 12658
MCLEATCHIE LAW GROUP, PLLC
602 South 10th Street
Las Vegas, NV 89101
Telephone: (702) 728-5300 / Fax: (702) 425-8220
Email: efile@nvlitigation.com
Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LANCE DOWNES-COVINGTON, an
individual, SOLDADERA SANCHEZ, an
individual, ROBERT O'BRIEN, an individual,
EMILY DRISCOLL, an individual, ALISON
KENADY, an individual, TENISHA MARTIN,
an individual, GABRIELA MOLINA, an
individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
LIEUTENANT KURT MCKENZIE, as an
individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
OFFICER TABATHA DICKSON, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN PATRICIA SPENCER, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN DORI KOREN, as an individual and
in his capacity as a Las Vegas Metropolitan Police
Department Officer; EVAN SPOON, as an
individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
JORDAN TURNER, as an individual and in his
capacity as a Las Vegas Metropolitan Police
Department Officer; UNKNOWN OFFICERS 1-
14, as individuals and in their capacity as Las
Vegas Metropolitan Police Department Officers,

Defendants.

Case. No.: 2:20-cv-01790-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN
AND SCHEDULING ORDER
DEADLINES**

(FIFTEENTH REQUEST)

STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN AND

SCHEDULING ORDER DEADLINES (FIFTEENTH REQUEST)

Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through their attorneys of record, Margaret A. McLetchie, Esq. and Leo S. Wolpert, Esq., with the law firm of McLetchie Law and Defendants, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD"), Lieutenant Kurt McKenzie ("McKenzie"), Officer Tabatha Dickson ("Dickson"), Captain Patricia Spencer ("Spencer"), Captain Dori Koren ("Koren"), Officer Evan Spoon ("Spoon"), and Officer Jordan Turner ("Turner"), collectively ("LVMPD Defendants"), by and through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach, hereby stipulate and agree to extend the Discovery Plan and Scheduling Order deadlines an additional ninety (90) days. This Stipulation is being entered in good faith and not for purposes of delay (supplemented information noted in **bold-face type**).

I. STATUS OF DISCOVERY.**A. PLAINTIFFS' DISCOVERY.**

1. Plaintiffs' Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2021;
2. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
3. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
4. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
5. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
6. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;

7. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;

8. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;

9. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of Requests for Production of Documents dated May 13, 2021;

10. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Requests for Production of Documents dated May 13, 2021;

11. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Requests for Production of Documents dated May 13, 2021;

12. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Requests for Production of Documents dated May 13, 2021;

13. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Requests for Production of Documents dated May 13, 2021;

14. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Requests for Production of Documents dated May 13, 2021;

15. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Requests for Production of Documents dated May 13, 2021;

16. Plaintiff Lance Downes-Covington's First Set of Interrogatories to LVMPD dated June 2, 2021;

17. Plaintiffs' First Set of Requests for Production of Documents to LVMPD dated June 2, 2021;

18. Plaintiff Emily Driscoll's First Set of Interrogatories to LVMPD dated July 1, 2021;

19. Plaintiffs' First Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated July 1, 2021;

20. Plaintiffs' Second Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated July 8, 2021;

21. Plaintiffs' Third Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated July 12, 2021;

22. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

23. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

24. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

25. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

26. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of Interrogatories dated June 8, 2021;

27. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

28. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

29. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

30. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

31. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

32. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

33. Plaintiff Gabriela Molina's Second Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 12, 2021;

34. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 12, 2021;

1 35. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of
2 Interrogatories dated July 12, 2021;

3 36. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's First
4 Set of Interrogatories dated July 12, 2021;

5 37. Plaintiff Tenisha Martin's First Set of Interrogatories to LVMPD dated July 13,
6 2021;

7 38. Plaintiffs' Second Set of Requests for Production of Documents to LVMPD dated
8 July 13, 2021;

9 39. Plaintiff Tenisha Martin's Second Set of Interrogatories to LVMPD dated July 14,
10 2021;

11 40. Plaintiffs' Third Set of Requests for Production of Documents to LVMPD dated
12 July 14, 2021;

13 41. Plaintiffs' Fourth Supplement to Initial Disclosure of Witnesses and Documents
14 Pursuant to FRCP 26.1(a)(1) dated September 15, 2021;

15 42. Plaintiff Tenisha Martin's Third Set of Interrogatories to LVMPD dated September
16 15, 2021;

17 43. Plaintiffs' Fourth Set of Requests for Production of Documents to LVMPD dated
18 September 15, 2021;

19 44. Plaintiffs' First Set of Requests for Admission to LVMPD dated September 17,
20 2021;

21 45. Tenisha Martin's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
22 dated December 16, 2021;

23 46. Soldadera Sanchez's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
24 dated December 16, 2021;

25 47. Robert O' Brien's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
26 dated December 16, 2021;

27 48. Lance Downes-Covington's Responses to Lt. Kurt McKenzie's First Set of
28 Interrogatories dated December 16, 2021;

1 49. Gabriela Molina's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
2 dated December 16, 2021;

3 50. Emily Driscoll's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
4 dated December 16, 2021;

5 51. Alison Kenady's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
6 dated December 16, 2021;

7 52. Tenisha Martin's Responses to LVMPD's First Set of Requests for Admissions
8 dated December 16, 2021;

9 53. Soldadera Sanchez's Responses to LVMPD's First Set of Requests for Admissions
10 dated December 16, 2021;

11 54. Robert O'Brien's Responses to LVMPD's First Set of Requests for Admissions
12 dated December 16, 2021;

13 55. Lance Downes-Covington's Responses to LVMPD's First Set of Requests for
14 Admissions dated December 16, 2021;

15 56. Gabriela Molina's Responses to LVMPD's First Set of Requests for Admissions
16 dated December 16, 2021;

17 57. Emily Driscoll's Responses to LVMPD's First Set of Requests for Admissions
18 dated December 16, 2021;

19 58. Alison Kenady's Responses to LVMPD's First Set of Requests for Admissions
20 dated December 16, 2021;

21 59. Alison Kenady's First Set of Interrogatories to LVMPD dated April 1, 2022;

22 60. Emily Driscoll's Second Set of Interrogatories to LVMPD dated April 1, 2022;

23 61. Gabriella Molina's First Set of Interrogatories to LVMPD dated April 1, 2022;

24 62. Lance Downes-Covington's Second Set of Interrogatories to LVMPD dated April
25 1, 2022;

26 63. Plaintiffs' Fifth Set of Requests for Production of Documents to LVMPD dated
27 April 1, 2022;

28 64. Robert O'Brien's First Set of Interrogatories to LVMPD dated April 1, 2022;

65. Plaintiffs' Second Set of Requests for Admissions to LVMPD dated April 1, 2022;

66. Sol Sanchez's First Set of Interrogatories to LVMPD dated April 1, 2022;

67. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe Lombardo [Request Nos. 1-5] dated June 17, 2022;

68. Plaintiffs' First Set of Requests for Admissions to Defendant Tabatha Dickson dated June 17, 2022;

69. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe Lombardo [Request Nos. 1-4] dated June 17, 2022;

70. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 17, 2022;

71. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 17, 2022;

72. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 17, 2022;

73. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June 17, 2022;

74. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD dated June 17, 2022;

75. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 17, 2022;

76. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 17, 2022;

77. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha Dickson dated June 17, 2022;

78. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June 17, 2022;

79. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated June 17, 2022;

80. Plaintiffs' First Set of Requests for Production of Documents to Defendant Patricia Spencer dated June 17, 2022;

81. Plaintiffs' First Set of Requests for Production of Documents to Defendant Dori Koren dated June 17, 2022;

82. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo [Request No. 1] dated June 17, 2022;

83. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt McKenzie dated June 17, 2022;

84. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated June 17, 2022;

85. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 21, 2022;

86. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD dated June 21, 2022;

87. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 21, 2022;

88. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June 21, 2022;

89. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 21, 2022;

90. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated June 21, 2022;

91. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June 21, 2022;

92. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 21, 2022;

93. Plaintiffs' First Set of Requests for Admissions to Officer Tabatha Dickson dated June 21, 2022;

94. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo [Request Nos. 1-5] dated June 21, 2022;

95. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt McKenzie dated June 21, 2022;

96. Plaintiffs' First Set of Requests for Production of Documents to Officer Tabatha Dickson dated June 21, 2022;

97. Plaintiffs' First Set of Requests for Production of Documents to Patricia Spencer dated June 21, 2022;

1 98. Plaintiffs' First Set of Requests for Production of Documents to Captain Dori Koren
2 dated June 21, 2022;

3 99. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha Dickson
4 dated June 21, 2022;

5 100. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated
6 June 21, 2022;

7 101. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 21,
8 2022;

9 102. Plaintiff Emily Driscoll's Requests for Admissions to LVMPD - Set One
10 dated October 27, 2022.

11 103. Plaintiff Emily Driscoll's Interrogatories to LVMPD - Set Four dated
12 October 27, 2022.

13 104. Plaintiff Emily Driscoll's Interrogatories to Tabatha Dickson - Set One
14 dated October 27, 2022.

15 105. Plaintiff Emily Driscoll's Requests for Production of Documents to
16 LVMPD - Set One dated October 27, 2022.

17 106. Plaintiff Emily Driscoll's Requests for Production of Documents to Tabatha
18 Dickson - Set One dated October 27, 2022.

19 107. Plaintiff Emily Driscoll's Requests for Admissions to Tabatha Dickson - Set
20 One dated October 27, 2022.

21 108. Plaintiff Gabriela Molina's Interrogatories to LVMPD - Set Two dated
22 October 27, 2022.

23 109. Plaintiff Gabriela Molina's Interrogatories to Tabatha Dickson - Set One
24 dated October 27, 2022.

25 110. Plaintiff Gabriela Molina's Requests for Production of Documents to
26 LVMPD - Set One dated October 27, 2022.

27 111. Plaintiff Gabriela Molina's Requests for Production of Documents to
28 Tabatha Dickson - Set One dated October 27, 2022.

112. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set One dated October 27, 2022.

113. Plaintiff Gabriela Molina's Requests for Admissions to Tabatha Dickson - Set One dated October 27, 2022.

114. Plaintiff Lance Downes-Covington's Interrogatories to LVMPD - Set Four dated October 27, 2022.

115. Plaintiff Lance Downes-Covington's Interrogatories to Tabatha Dickson - Set Two dated October 27, 2022.

116. Plaintiff Lance Downes-Covington's Interrogatories to Jordan Turner - Set One dated October 27, 2022.

117. Plaintiff Lance Downes-Covington's Requests for Production of Documents to LVMPD - Set One dated October 27, 2022.

118. Plaintiff Lance Downes-Covington's Requests for Production of Documents to Tabatha Dickson - Set One dated October 27, 2022.

119. Plaintiff Lance Downes-Covington's Requests for Production of Documents to Jordan Turner - Set One dated October 27, 2022.

120. Plaintiff Lance Downes-Covington's Requests for Admissions to LVMPD - Set One dated October 27, 2022.

121. Plaintiff Lance Downes-Covington's Requests for Admissions to Tabatha Dickson - Set One dated October 27, 2022.

122. Plaintiff Lance Downes-Covington's Requests for Admissions to Jordan Turner - Set One dated October 27, 2022.

123. Soldadera Sanchez's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

124. Soldadera Sanchez's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

125. Robert O'Brien's Interrogatories to LVMPD - Set One dated November 7, 2022.

126. Robert O'Brien's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

127. Robert O'Brien's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

128. Alison Kenady's Interrogatories to LVMPD - Set Two dated November 7, 2022.

129. Alison Kenady's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

130. Alison Kenady's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

131. Tenisha Martin's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

132. Tenisha Martin's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

133. Plaintiffs' Fifth Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 4, 2023;

134. Plaintiffs' Sixth Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2023.

135. Tenisha Martin's Requests for Production of Documents to LVMPD - Set Two, dated January 17, 2023.

136. Tenisha Martin's Requests for Production of Documents to LVMPD - Set Three, dated April 18, 2023.

137. Plaintiff Lance Downes-Covington's Requests for Production to LVMPD - Set Two dated May 16, 2023.

138. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set Two dated June 14, 2023.

139. Plaintiffs' Eighth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 30, 2024.

1 140. **Plaintiffs' Ninth Supplemental Disclosure of Witnesses and Documents**
2 **Pursuant to FRCP 26.1(a)(1) dated February 27, 2024.**

3 141. **Plaintiffs' Tenth Supplemental Disclosure of Witnesses and Documents**
4 **Pursuant to FRCP 26.1(a)(1) dated April 18, 2024.**

5 **B. DEFENDANTS' DISCOVERY.**

6 1. LVMPD Defendants' Initial Disclosure of Witnesses and Documents Pursuant to
7 FRCP 26.1(a)(1) dated January 20, 2021.

8 2. LVMPD's First Set of Interrogatories to Plaintiff Lance Downes-Covington dated
9 March 12, 2021.

10 3. LVMPD's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated March
11 12, 2021.

12 4. LVMPD's First Set of Interrogatories to Plaintiff Robert O'Brien dated March 12,
13 2021.

14 5. LVMPD's First Set of Interrogatories to Plaintiff Emily Driscoll dated March 12,
15 2021.

16 6. LVMPD's First Set of Interrogatories to Plaintiff Alison Kenady dated March 12,
17 2021.

18 7. LVMPD's First Set of Interrogatories to Plaintiff Tenisha Martin dated March 12,
19 2021.

20 8. LVMPD's First Set of Interrogatories to Plaintiff Gabriela Molina dated March 12,
21 2021.

22 9. LVMPD's First Set of Request for Production of Documents to Plaintiff Lance
23 Downes-Covington dated March 12, 2021.

24 10. LVMPD's First Set of Request for Production of Documents to Plaintiff Soldadera
25 Sanchez dated March 12, 2021.

26 11. LVMPD's First Set of Request for Production of Documents to Plaintiff Robert
27 O'Brien dated March 12, 2021.
28

1 12.LVMPD's First Set of Request for Production of Documents to Plaintiff Emily
2 Driscoll dated March 12, 2021.

3 13.LVMPD's First Set of Request for Production of Documents to Plaintiff Alison
4 Kenady dated March 12, 2021.

5 14.LVMPD's First Set of Request for Production of Documents to Plaintiff Tenisha
6 Martin dated March 12, 2021.

7 15.LVMPD's First Set of Request for Production of Documents to Plaintiff Gabriela
8 Molina dated March 12, 2021.

9 16.LVMPD Defendants' First Supplement to Initial Disclosures of Witnesses and
10 Documents Pursuant to FRCP 26.1(a)(1) dated July 20, 2021.

11 17.LVMPD's Answers to Plaintiff Lance Downes-Covington's First Set of
12 Interrogatories dated July 20, 2021.

13 18.LVMPD's Responses to Plaintiffs' First Set of Requests for Production of
14 Documents dated July 20, 2021.

15 19.LVMPD's Responses to Plaintiff Emily Driscoll's First Set of Interrogatories dated
16 August 3, 2021.

17 20.LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's First Set
18 of Interrogatories dated August 3, 2021.

19 21.LVMPD's Supplemental Responses to Plaintiffs' First Set of Requests for
20 Production of Documents dated August 3, 2021.

21 22.LVMPD Defendants' Second Supplement to Initial Disclosures of Witnesses and
22 Documents Pursuant to FRCP 26.1(a)(1) dated August 4, 2021.

23 23.LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's First Set
24 of Interrogatories dated August 9, 2021.

25 24.LVMPD Defendants' Third Supplement to Initial Disclosures of Witnesses and
26 Documents Pursuant to FRCP 26.1(a)(1) dated August 16, 2021.

27 25.LVMPD's Responses to Plaintiff Tenisha Martin's First Set of Interrogatories dated
28 August 16, 2021.

1 26.LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of Interrogatories
2 dated August 16, 2021.

3 27.LVMPD's Responses to Plaintiffs' Third Set of Requests for Production of
4 Documents dated August 16, 2021.

5 28.LVMPD's Responses to Plaintiffs' Second Set of Requests for Production of
6 Documents dated August 30, 2021.

7 29.LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of Interrogatories
8 dated August 30, 2021.

9 30.LVMPD Defendants' Fourth Supplement to Initial Disclosures of Witnesses and
10 Documents Pursuant to FRCP 26.1(a)(1) dated August 30, 2021.

11 31.LVMPD Defendants' Privilege Log dated August 30, 2021.

12 32.LVMPD's Amended Responses to Plaintiffs' Third Set of Requests for Production
13 of Documents dated September 13, 2021.

14 33.LVMPD's Amended Responses to Plaintiffs' Second Set of Requests for
15 Production of Documents dated September 13, 2021.

16 34.LVMPD's Amended Responses to Plaintiff Tenisha Martin's Second Set of
17 Interrogatories dated September 13, 2021.

18 35.LVMPD's Amended Responses to Plaintiff Emily Driscoll's First Set of
19 Interrogatories dated September 13, 2021.

20 36.Lt. McKenzie's First Set of Interrogatories to Plaintiff Lance Downes-Covington
21 dated September 22, 2021.

22 37.Lt. McKenzie's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated
23 September 22, 2021.

24 38.Lt. McKenzie's First Set of Interrogatories to Plaintiff Robert O'Brien dated
25 September 22, 2021.

26 39.Lt. McKenzie's First Set of Interrogatories to Plaintiff Emily Driscoll dated
27 September 22, 2021.

28

1 40.Lt. McKenzie's First Set of Interrogatories to Plaintiff Alison Kenady dated
2 September 22, 2021.

3 41.Lt. McKenzie's First Set of Interrogatories to Plaintiff Tenisha Martin dated
4 September 22, 2021.

5 42.Lt. McKenzie's First Set of Interrogatories to Plaintiff Gabriela Molina dated
6 September 22, 2021.

7 43.LVMPD's First Set of Requests for Admission to Plaintiff Lance Downes-
8 Covington dated September 22, 2021.

9 44.LVMPD's First Set of Requests for Admission to Plaintiff Soldadera Sanchez dated
10 September 22, 2021.

11 45.LVMPD's First Set of Requests for Admission to Plaintiff Robert O'Brien dated
12 September 22, 2021.

13 46.LVMPD's First Set of Requests for Admission to Plaintiff Emily Driscoll dated
14 September 22, 2021.

15 47.LVMPD's First Set of Requests for Admission to Plaintiff Alison Kenady dated
16 September 22, 2021.

17 48.LVMPD's First Set of Requests for Admission to Plaintiff Tenisha Martin dated
18 September 22, 2021.

19 49.LVMPD's First Set of Requests for Admission to Plaintiff Gabriela Molina dated
20 September 22, 2021.

21 50.LVMPD Defendants' Fifth Supplement to Initial Disclosures of Witnesses and
22 Documents Pursuant to FRCP 26.1(a)(1) dated October 11, 2021.

23 51.LVMPD's Responses to Plaintiffs' Fourth Set of Requests for Production of
24 Documents dated October 18, 2021.

25 52.LVMPD's Responses to Plaintiff Tenisha Martin's Third Set of Interrogatories
26 dated October 18, 2021.

27 53.LVMPD's Responses to Plaintiffs' First Set of Requests Admission dated October
28 20, 2021.

1 54.LVMPD's Answers to Plaintiff Lance Downes-Covington's Second Set of
2 Interrogatories dated May 5, 2022.

3 55.LVMPD's Answers to Plaintiff Alison Kenady's First Set of Interrogatories dated
4 May 5, 2022.

5 56.LVMPD's Answers to Plaintiff Robert O'Brien's First Set of Interrogatories dated
6 May 5, 2022.

7 57.LVMPD's Answers to Plaintiff Sol Sanchez's First Set of Interrogatories dated
8 May 5, 2022.

9 58.LVMPD's Responses to Plaintiffs' Fifth Set of Requests for Production of
10 Documents dated May 5, 2022.

11 59.LVMPD's Answers to Plaintiff Emily Driscoll's Second Set of Interrogatories
12 dated May 5, 2022.

13 60.LVMPD's Answers to Plaintiff Gabriella Molina's First Set of Interrogatories dated
14 May 5, 2022.

15 61.LVMPD's Responses to Plaintiffs' Second Set of Requests for Admissions dated
16 May 5, 2022.

17 62.LVMPD's Second Supplemental Answers to Plaintiff Lance Downes-Covington's
18 First Set of Interrogatories dated June 24, 2022.

19 63.LVMPD's First Supplemental Responses to Plaintiffs' Second Set of Requests for
20 Production of Documents dated June 24, 2022.

21 64.LVMPD's First Supplemental Answers to Plaintiff Tenisha Martin's Second Set of
22 Interrogatories dated June 24, 2022.

23 65.LVMPD's Second Supplemental Responses to Plaintiffs' First Set of Requests for
24 Production of Documents dated June 24, 2022.

25 66.Lt. Kurt McKenzie's Answers to Soldadera Sanchez's First Set of Interrogatories
26 dated August 8, 2022.

27 67.Lt. Kurt McKenzie's Answers to Tenisha Martin's First Set of Interrogatories dated
28 August 8, 2022.

1 68. Lt. Kurt McKenzie's Responses to Plaintiffs' First Set of Requests for Production
2 of Documents dated August 8, 2022.

3 69. Patricia Spencer's Responses to Plaintiffs' First Set of Requests for Production of
4 Documents dated August 8, 2022.

5 70. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for Admissions
6 dated August 8, 2022.

7 71. Tabatha Dickson's Answers to Lance Downes-Covington's First Set of
8 Interrogatories dated August 8, 2022.

9 72. LVMPD's Responses to Plaintiffs' Third Set of Requests for Admissions dated
10 August 8, 2022.

11 73. LVMPD's Answers to Lance Downes-Covington's Third Set of Interrogatories
12 dated August 8, 2022.

13 74. LVMPD's Answers to Soldadera Sanchez's Second Set of Interrogatories dated
14 August 8, 2022.

15 75. Captain Dori Koren's Responses to Plaintiffs' First Set of Requests for Production
16 of Documents dated August 8, 2022.

17 76. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for Production of
18 Documents dated August 8, 2022.

19 77. LVMPD's Answers to Robert O'Brien's Second Set of Interrogatories dated August
20 8, 2022.

21 78. LVMPD's Answers to Tenisha Martin's Fourth Set of Interrogatories dated August
22 8, 2022.

23 79. LVMPD's Responses to Plaintiffs' Sixth Set of Requests for Production of
24 Documents dated August 8, 2022.

25 80. LVMPD's Answers to Emily Driscoll's Third Set of Interrogatories dated August
26 8, 2022.

27 81. LVMPD Defendants' Sixth Supplemental FRCP 26.1 Disclosures dated August 8,
28 2022.

82. LVMPD Defendants' Seventh Supplemental FRCP 26.1 Disclosures dated December 6, 2022.

83. Jordan Turner's Responses to Lance Downes-Covington's Requests for Production – Set One, dated December 6, 2022.

84. Jordan Turner's Responses to Lance Downes-Covington's Requests for Admission – Set One, dated December 6, 2022.

85. Jordan Turner's Responses to Lance Downes-Covington's Interrogatories – Set One, dated December 6, 2022.

86. Jordan Turner's Responses to Lance Downes-Covington's Requests for Admission – Set One, dated December 6, 2022.

87. Jordan Turner's Responses to Gabriela Molina's Requests for Production – Set One, dated December 6, 2022.

88. Tabatha Dickson's Responses to Lance Downes Covington's Requests for Production – Set One, dated December 6, 2022.

89. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories – Set One, dated December 6, 2022.

90. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories – Set Two, dated December 6, 2022.

91. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for Admission – Set One, dated December 6, 2022.

92. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for Production – Set One, dated December 6, 2022.

93. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set One, dated December 6, 2022.

94. Tabatha Dickson's Responses to Gabriela Molina's Requests for Admission – Set One, dated December 6, 2022.

95. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories – Set One, dated December 6, 2022.

96. Tabatha Dickson's Responses to Gabriela Molina's Requests for Production – Set One, dated December 6, 2022.

97. Tabatha Dickson's Responses to Emily Driscolls' Requests for Admission – Set One, dated December 6, 2022.

98. Tabatha Dickson's Responses to Emily Driscolls' Interrogatories – Set One, dated December 6, 2022.

99. LVMPD'S Responses to Lance Downes Covington's Requests for Production – Set One, dated December 6, 2022.

100. LVMPD'S Responses to Lance Downes Covington's Requests for Admission – Set One, dated December 6, 2022.

101. LVMPD'S Responses to Lance Downes Covington's Interrogatories – Set Four, dated December 6, 2022.

102. LVMPD's Responses to Emily Driscolls' Interrogatories – Set One, dated December 6, 2022.

103. LVMPD's Responses to Emily Driscolls' Interrogatories – Set Four, dated December 6, 2022.

104. LVMPD's Responses to Emily Driscolls' Requests for Admission – Set One, dated December 6, 2022.

105. LVMPD's Responses to Emily Driscolls' Requests for Production – Set One, dated December 6, 2022.

106. LVMPD's Responses to Gabriela Molina's Interrogatories – Set Two, dated December 6, 2022.

107. LVMPD's Responses to Gabriela Molina's Requests for Production– Set One, dated December 6, 2022.

108. LVMPD's Responses to Gabriela Molina's Requests for Admission – Set One, dated December 6, 2022.

109. LVMPD Defendants' Eighth Supplemental FRCP 26.1 Disclosures dated December 16, 2022.

110. LVMPD'S Responses to Tenisha Martin's Requests for Admission – Set One, dated December 19, 2022.

111. LVMPD'S Responses to Soldadera Sanchez's Requests for Admission – Set One, dated December 19, 2022.

112. LVMPD'S Responses to Robert O'Brien's Requests for Admission – Set One, dated December 19, 2022.

113. LVMPD'S Responses to Alison Kenady's Requests for Admission – Set One, dated December 19, 2022.

114. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set One, dated December 19, 2022.

115. LVMPD'S Responses to Alison Kenady's Requests for Production – Set One, dated December 20, 2022.

116. LVMPD'S Responses to Robert O'Brien's Requests for Production – Set One, dated December 20, 2022.

117. LVMPD's Responses to Soldadera Sanchez' Requests for Production – Set One, dated December 20, 2022.

118. LVMPD'S Responses to Tenisha Martin's Requests for Production – Set One, dated December 20, 2022.

119. LVMPD'S Responses to Alison Kenady's Interrogatories – Set Two, dated January 4, 2023.

120. LVMPD'S Responses to Robert O'Brien's Interrogatories – Set Three, dated January 4, 2023.

121. LVMPD'S Responses to Alison Kenady's Interrogatories - Set Two, dated January 4, 2023.

122. LVMPD'S Responses to Robert O'Brien's Interrogatories - Set Three, dated January 4, 2023.

123. LVMPD's Ninth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1), dated February 16, 2023.

124. LVMPD's First Supplemental Answers to Plaintiff Robert O'Brien's First Set of Interrogatories, dated February 16, 2023.

125. LVMPD's First Supplemental Answers to Plaintiff Soldadera Sanchez's Second Set of Interrogatories, dated February 16, 2023.

126. LVMPD's Third Supplemental Responses to Plaintiffs' First Set of Requests for Production of Documents, dated February 16, 2023.

127. LVMPD's Second Supplemental Responses to Plaintiff's Second Set of Requests for Production of Documents, dated February 16, 2023.

128. LVMPD's First Supplemental Responses to Plaintiffs' Sixth Set of Requests for Production of Documents, dated February 16, 2023.

129. LVMPD'S Responses to Plaintiff Tenisha Martin's Requests for Production of Documents - Set One [sic Set Two], dated February 16, 2023.

130. LVMPD's Tenth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1), dated February 24, 2023.

131. LVMPD's Responses to Tenisha Martin's Requests for Production of Documents - Set Three dated May 22, 2023.

132. LVMPD's Responses to Gabriela Molina's Requests for Admissions - Set Two dated July 17, 2023.

133. LVMPD's Responses to Lance Downes-Covington's Requests for Production of Documents - Set Two dated July 17, 2023.

134. LVMPD's Eleventh Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1), dated July 17, 2023.

135. LVMPD's Twelfth Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1), dated April 24, 2024.

C. DEPOSITIONS.

1. LVMPD Defendants deposed Plaintiff Alison Kenady on August 9, 2022.

2. LVMPD Defendants deposed Plaintiff Gabriela Molina on August 10, 2022.

3. LVMPD Defendants deposed Plaintiff Emily Driscoll on August 11, 2022.

4. LVMPD Defendants deposed Plaintiff Tenisha Martin on August 16, 2022.

5. LVMPD Defendants deposed Plaintiff Lance Downes-Covington on August 19, 2022.

6. LVMPD Defendants deposed Plaintiff Soldadera Sanchez on August 20, 2022.

7. Plaintiffs deposed Defendant Officer Jordan Turner on October 18, 2022.

8. Plaintiffs deposed Defendant Officer Tabatha Dickson on October 24, 2022.

9. Plaintiffs deposed Defendant Officer Evan Spoon on November 7, 2022.

10. Plaintiffs deposed Defendant Retired Captain Patricia Spencer on November 15, 2022.

11. Plaintiffs deposed Defendant Captain Dori Koren on November 22, 2022.

12. Plaintiffs deposed Defendant Lt. Kurt McKenzie on December 21, 2022.

13. LVMPD Defendants deposed Plaintiff Robert O'Brien on March 24, 2023.

14. Plaintiffs deposed LVMPD Defendants' FRCP 30(b)(6) designee(s) - Lt. Landon Reyes on June 20, 2023.

15. Plaintiffs' Deposition Subpoena to Las Vegas Justice Court per FRCP 30(b)(6) for records related to Defendants' citations and arrests during the 2020 BLM Protests.

16. Plaintiffs' Deposition Subpoena to Las Vegas Municipal Court per FRCP 30(b)(6) for records related to Defendants' citations and arrests during the 2020 BLM Protests.

17. Plaintiffs deposed Defendants' FRCP 30(b)(6) designee(s) (Dori Koren) on April 26, 2024.

18. Plaintiffs will be deposing Defendants' FRCP 30(b)(6) designee(s) (John McGrath) in May or June 2024.

II. DISCOVERY THAT REMAINS TO BE COMPLETED.

The Parties are actively conducting discovery and have completed the majority of the written discovery and depositions. However, the Parties are continuing to meet and confer on outstanding discovery issues.

The Parties' primary remaining discovery tasks include: (1) Plaintiffs have subpoenaed records from the Las Vegas Municipal Court and Las Vegas Justice Court for documents concerning Defendant's misdemeanor citations and arrests during the BLM Protests in 2020 and are in the process of obtaining records related to the same; (2) resolution of meet and confer issues and motion practice if needed; (3) Plaintiffs' deposition of Defendant Las Vegas Metropolitan Police Department's FRCP 30(b)(6) designee John McGrath; (4) expert disclosures; (5) rebuttal reports; and (6) depositions of the experts.

III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.

This is the **fifteenth** request for an extension of discovery deadlines in this matter. The Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional ninety (90) days so that the Parties may complete the tasks above and efficiently manage expert disclosures. **This involves waiting for deposition transcripts requiring expert review and analysis and Defendants need to supplement their production of Bates stamped documents.**

The Parties acknowledge that, pursuant to Local Rule 26-3, the Parties must establish that good cause exists to extend the deadlines.

The Parties have been diligently conducting discovery and continue to conduct discovery, but an extension is still needed to efficiently conclude discovery and manage the case.

Additionally, the parties are continuing to meet and confer with Defendants' counsel regarding the FRCP 30(b)(6) deposition and subpoenas. Meet and confer efforts are ongoing. Likewise, the experts retained in this matter will also need to review the recent discovery responses, Defendants' supplemental responses (if any), information and documents in response to Plaintiffs' subpoenas to Justice Court and Municipal Court, BWC videos, and all deposition transcripts, including the two FRCP 30(b)(6) designees—Dori Koren and John McGrath. While Dori Koren was deposed on April 26, 2024, the deposition transcript is currently pending. Counsel are conferring to schedule a deposition date for John McGrath for May or June 2024 due to the schedule conflicts of counsel and the designees.

1 This deposition will occur after the current deadline for initial expert disclosures. The Parties
 2 are working with their respective experts to prepare their expert disclosures. However, as
 3 noted, the Parties contend that it is more efficient to allow further discovery to be completed
 4 before initial expert disclosures to minimize the need for supplementation.

5 **Counsel for Plaintiffs have also been required to spend time out of the office**
 6 **(and/or out of the jurisdiction) in March and April to attend to family obligations.**
 7 **Specifically, Ms. McLetchie has been assisting her mother with a treatment plan for**
 8 **Stage IV cancer which metastasized to her liver and recently, her spine. Mr. Wolpert**
 9 **has been assisting his father—who lives out of the jurisdiction in Tucson, Arizona—**
 10 **with treatments for (and amelioration of) symptoms of amyotrophic lateral sclerosis**
 11 **(ALS), which has left him without the use of his arms and hands. Although feeding-tube**
 12 **surgery was initiated during the week of April 3, 2024, the operation was aborted due**
 13 **to medical complications, and thus Mr. Wolpert will likely return to Tucson in May**
 14 **when the operation is rescheduled. Furthermore, Pieter O’Leary, a senior attorney at**
 15 **McLetchie Law, is leaving the firm effective May 3, 2024, requiring Ms. McLetchie and**
 16 **Mr. Wolpert to devote additional attention to matters in which Mr. O’Leary was lead**
 17 **counsel.**

18 **Additionally, counsel for Defendants has continued to have medical issues in**
 19 **April and May and has an upcoming trial.**

20 The Parties thus respectfully request an extension of time to enable them to conduct
 21 necessary discovery and so that this matter is fairly resolved on the merits. “Good cause to
 22 extend a discovery deadline exists ‘if it cannot reasonably be met despite the diligence of the
 23 party seeking the extension.’” *Derosa v. Blood Sys., Inc.*, No. 2:13-cv-0137-JCM-NJK, 2013
 24 U.S. Dist. LEXIS 108235, 2013 WL 3975764, at 1 (D. Nev. Aug. 1, 2013) (*quoting Johnson*
 25 *v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)); see also Fed. R. Civ. P. 1
 26 (providing that the Rules of Civil Procedure “should be construed, administered, and
 27 employed by the court and the Parties to secure the just, speedy, and inexpensive
 28 determination of every action and proceeding”). As the procedural history of this case

illustrates, the Parties have been diligent in litigating this matter. Significant written discovery has been exchanged, nearly all depositions are complete, experts are engaged, and counsel continue to meet and confer regarding various topics. Additionally, counsel for the Parties in this matter are litigating several other unrelated matters (including against each other) which have competing demands. While competing demands of litigation are merely one of many reasons for the instant request, it should be noted that the other litigation between the same counsel involving similar issues can only benefit from the completion of discovery in this matter so that in other litigation, similar requests can be expedited and can further the resolution of those matters and the interests of justice. Indeed, counsel for the Parties continue to engage in settlement discussions regarding this and the other matters they are litigating that stem from the BLM protests.

Thus, the standards to extend all deadlines, including the expert deadlines, is satisfied here.

Based on the foregoing stipulation and proposed deadlines, the Parties thus respectfully request an extension of time to extend the deadlines in this matter to enable to them to conduct necessary discovery and so that this matter is fairly resolved on the merits.

IV. PROPOSED SCHEDULE FOR REMAINING DEADLINES

Event	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	June 14, 2022	Past/Unchanged
Initial Expert Disclosures	May 3, 2024	August 1, 2024
Rebuttal Expert Disclosures	June 7, 2024	September 5, 2024
Discovery Cut-Off	June 28, 2024	September 26, 2024
Dispositive Motions	August 21, 2024	November 19, 2024
Pretrial Order	September 3, 2024	December 2, 2024 (If dispositive motions are filed, the deadline for shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)

Based on the foregoing stipulation and proposed deadlines plan, the Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional ninety (90) days so that the Parties may conduct additional discovery, and efficiently manage expert disclosures.

Dated this 3rd day of May, 2024.

MCLECHIE LAW

By: /s/ Leo S. Wolpert

Margaret A. McLetchie, Esq.
Nevada Bar No. 10931
Leo S. Wolpert, Esq.
Nevada Bar No. 12658
602 South 10th Street
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

Dated this 3rd day of May, 2024.

MARQUIS AURBACH

By: /s/ Jackie V. Nichols

Craig R. Anderson, Esq.
Nevada Bar No. 6882
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Defendants Las Vegas
Metropolitan Police Department,
Lieutenant Kurt McKenzie, Officer
Tabatha Dickson, Captain Patricia
Spencer, Captain Dori Koren, Officer
Evan Spoon and Officer Jordan Turner*

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: May 6, 2024
